LARGE QUANTITY GENERATOR INSPECTION FORM
HAZARDOUS WASTE MANAGEMENT PROGRAM
WISCONSIN DEPARTMENT OF NATURAL RESOURCES

I. **GENERAL INFORMATION**

DEPARTMENT INFORMATION

DNR District:_____ **Inspection date:**_____

DNR Inspector(s)_____

_____

GENERATOR INFORMATION EPA ID: _____ FID: _____

Corporate/Generator Name: _____
Generator Location:

Street: _____

City: _____ **County:** _____ **Zip:** _____

Site Personnel Present: _____ **Title:** _____

_____ _____

Generator Mailing Address:

Street: _____

City: _____ **State:** _____ **Zip:** _____

Phone: _____

Operator: _____ **Title:**_____

Phone: _____

Legal Owner: _____ **Title:** _____

Street: _____

City: _____ **State:** _____ **Zip:** _____

Phone: _____

Company Product/Main Process: _____
_____
_____

II. **SUMMARY TABLE**

Waste Type	Generation Rate/Month	Hazardous Waste Code	LDR Status+	Exceeds Treatment Standards Yes/No	Waste Handling*
1)					
2)					
3)					
4)					
5)					
6)					
7)					
8)					

Attach waste profile, analysis, MSDS's, or other information to indicate how the facility has complied with NR 615.06, Hazardous Waste Determination, for each waste stream.

+LDR Status - use the following codes:

1. F001-F005 Solvents (NR 675.11)
2. F020-F023, F026-F028, Dioxins (NR 675.12)
3. California list (NR 675.13)
4. First 3rd (NR 675.14)
5. Second 3rd (NR 675.15)
6. Third 3rd (NR 675.16)

**Waste handling - Indicate if the waste is handled on-site or provide name of off-site facility.*

III. **NOTIFICATION**: NR 615.07

A. Has the generator submitted a notification form to the Department and obtained an identification number? Yes No

B. 1. Has the generator changed its ownership or added new hazardous waste activities? Yes No

2. Has a subsequent notification form been completed? Yes No NA

C. 1. Has the generator changed its corporate name (no change in ownership, mailing address and/or waste codes)? Yes No

2. Has a letter to DNR and EPA or a subsequent notification form been completed? Yes No NA

Comments: _____

IV. **WASTE STREAM INFORMATION**

A. **Waste Determination NR 605.12, NR 615.06, NR 675**

1. Have all wastes been correctly identified, and if necessary, tested to obtain enough information to treat, store or dispose of the waste properly. (NR 675) Yes No

If no, list those not identified correctly below:

Note: The inspector should determine if the generator has made a hazardous waste determination on all solid waste generated, including compliance with the TCLP requirements of NR 675.07 and NR 605.08(5)

Waste Type	Assigned Classification	Correct Classification

2. Are records of test results, waste analyses, or other determinations retained on site for at least 3 years from the date waste last sent to a TSD facility? Yes No

3. Have waste samples been analyzed by a laboratory certified or registered under Chapter NR 149, Wis. Adm. Code for all analyses performed? NR 605.12(1) Yes No

4. Have both the listed and characteristic waste code been assigned where a listed waste exhibits a characteristic? NR 675.09 Yes No NA

5. Has multi-source leachate been assigned the F039 waste code?* NR 605.09(2) Yes No NA

**Leachate derived exclusively from F020-F023 and/or F026-F028 dioxin wastes retains the individual waste codes.*

If yes, was single-source leachate combined to form multi-source leachate? Yes No NA

6. If any process has changed that affected solid waste characteristics, has the generator made a new hazardous waste determination? NR 615.06(4) Yes No NA

Comments: _____

_____

B. **Treatability Group/Treatment Standard Identification**

1. F001-F005 Spent Solvent Wastes; F020-F023 and F026-F028 Dioxin Wastes; First, Second, and Third 3rd Wastes:

a. Does the generator correctly determine the appropriate treatability group/treatment standard for each waste? Yes No NA

If available, list each waste code and check correct treatability group.

Waste Code	Subcategory	Wastewater*	Nonwastewater

Subcategory-see NR 675.21, Table Constituent Concentrations in Waste Extract, or NR 675.22, Tables 2 and 3 Technology-Based Standards

**Wastewater-less than 1% TOC by weight and less than 1% total suspended solids (TSS) by weight. NR 600.03(237m)*

b. Do the assigned treatment standards for listed wastes cover constituents that may cause the waste to exhibit any characteristics? NR 675.09(2) Yes No NA

c. Does the generator specify alternative treatment standards for lab packs? Yes No NA

If yes, do lab packs only contain the following wastes? NR 675.22(4)(b)

__ Organometallics: NR 675 Appendix III

__ Organics: NR 675 Appendix IV

d. Does the generator specify alternative treatment standards for F039 multi-source leachate? Yes No NA

2. California List Wastes: Has the generator correctly identified the treatability group and treatment standard/prohibition level for the following wastes? (NR 675.22(1)(a) and (b)

a. Liquid hazardous wastes containing PCBs - ≥50 ppm — Yes No NA

If yes, check the appropriate treatability group:

_____ 50 to 500 ppm PCBs _____ ≥500 ppm PCBs

b. Listed or characteristic wastes containing ≥1,000 mg/l (liquids) or mg/kg (non-liquids) HOCs, which are not listed or characterized by the HOC content. — Yes No NA

If yes, check the appropriate treatability group:

_____ Dilute HOC wastewater (1,000 mg/l to 10,000 mg/l HOCs)
_____ All other HOC's greater than or equal to the prohibition level of 1,000 mg/l (liquids) or mg/kg (non-liquids)

c. Liquid hazardous wastes that exhibit a characteristic and also contain ≥134 mg/l nickel and/or ≥130 mg/l thallium. — Yes No NA

3. Treatment standards expressed as required technologies: Has the generator specified an alternative method to that required in NR 675.22? — Yes No NA

If yes, list the waste code, the technology specified in NR 675.22, the alternative method, and documentation of approval. NR 675.22(2)

Waste Code	Required Technology	Alternative Method	Approval

4. Does the generator mix restricted wastes with different treatment standards for a constituent of concern? — Yes No

If yes, did the generator select the most stringent treatment standards? (NR 675.21(2) and NR 675.23(2)) — Yes No NA

Comments: _____

C. **Waste Analysis**

1. Does the generator determine whether restricted wastes exceed treatment standards/prohibition levels at the point of generation? NR 675.07(1) — Yes No

2. If the answer to question 1 is no, does the generator ship all restricted wastes as not meeting treatment standards? If yes, go to question 4. — Yes No NA

3. Which of the following analytical methods does the generator employ? Under each method, list the specific wastes and pertinent documentation. NR 675.07

a. Knowledge of waste: — Yes No NA

_____
_____

b. TCLP: Are wastes with treatment standards specified in NR 675.21 and 40 CFR 268.41 analyzed using TCLP? BDAT = stabilization/immobilization technology. — Yes No NA

c. Total constituent analysis: Are wastes with treatment standards specified in NR 675.23 analyzed using total constituent analysis? (BDAT = destruction/removal technology) — Yes No NA

d. PFLT*: Was PFLT used to determine if California List constituents were contained in liquid hazardous waste? — Yes No NA

*PFLT = Paint filter liquids Test [Test Method 9095, EPA Publication No. SW-846]

4. Dilution Prohibition NR 675.06:

a. Does the generator mix prohibited wastes with different treatment standards? — Yes No

List the wastes _____

Are the wastes amenable to the same type of treatment? — Yes No NA

b. Does the generator dilute prohibited wastes to meet the treatment standard criteria, or render them nonhazardous? — Yes No

If no, go to c.

Check appropriate category:

__ Dilutes to meet treatment standards
__ Dilutes to render waste nonhazardous

Do the wastes fall into the following categories? (Check if appropriate.)

__ Managed in treatment systems regulated under the Chapter 147, Wis. Stats.
__ Nontoxic* characteristic wastes
__ Treatment standard specified in NR 675.21 or NR 675.23

**Nontoxic = D001 (except high TOC nonwastewaters), D002, and DOO3 (except cyanides and sulfides)*

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

_____

c. Based on an assessment of points a and b, and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute for adequate treatment? NR 675.06 — Yes No

5. F039 Multi-source leachate: Has the generator run an initial analysis for all constituents of concern in NR 675.21 and NR 675.23? — Yes No NA

Comments: _____

V. **ON-SITE MANAGEMENT**

A. If the generator treats characteristic wastes in systems regulated under Chapter 147, Wis. Stats., have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an WPDES permit are not prohibited (if applicable)? Yes No NA

B. If the generator treats characteristic wastes in RCRA exempt units to render them nonhazardous, are the wastes managed as restricted until NR 675 treatment standards are met?* Yes No NA
NR 675.09(4)

**This applies to both concentration based treatment standards specified in NR 675.21 and NR 675.23, and to some NR 675.22 required methods which result in treatment below the characteristic level. See Appendix D of the U.S. EPA land disposal restrictions package. (Third 3rd)*

C. **Treatment Using NR 630 Exempt Units or Processes**

1. Are restricted wastes treated in NR 630 exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)? Yes No

If no, go to section VI.

Waste Type	Waste Code	Type of Treatment	Treatment Units and Process

2. Are treatment residuals generated from these units? Yes No NA

3. Are residuals further treated, stored for greater than 90 days, or disposed on site? Yes No NA

If yes, the generator is also is a TSD

Comments: _____

VI. **OFF-SITE MANAGEMENT AND MANIFEST REQUIREMENTS**

A. **Manifest Requirements: NR 615.08, 615.09, 615.11(2), 615.12 & 615.13**

1. Does the generator initiate a uniform manifest form with all off-site shipments of hazardous waste? NR 615.08(1) Yes No

2. Are copies of all manifests for the past 3 years retained by the generator and available for review? NR 615.08(7) Yes No

3. Does the manifest specify a designated facility which is permitted, licensed, or exempt from permitting or licensing and approved to take the waste? NR 615.08(3) Yes No

4. Are procedures for exception reporting followed properly, if an exception has occurred? NR 615.11(2) Yes No

5. Does the generator properly route manifest copies to the Department and the consignment state (if waste was shipped out of state)? NR 615.08(6), (9) & (10) Yes No

6. Are the manifests properly completed? NR 615.08(8)(a)-(1) Yes No

7. If verifiable, is waste packaged marked and labeled in accordance with DOT regulations concerning hazardous materials? NR 615.08(8)(f), NR 615.09(1) and (2) Yes No NA

8. Does the generator offer the initial transporter of the hazardous waste the appropriate placards required by DOT regulations? NR 615.09(3) Yes No

Comments: _____

B. **Off-Site Management: Waste Exceeds Treatment Standards**

1.	Does the generator ship any waste that exceeds treatment standards/prohibition levels to an off-site treatment or storage facility? *If no, go to C.*	Yes	No	
2.	Does the generator provide a notification to the treatment or storage facility with each waste shipment? NR 675.07(1)(1)	Yes	No	
3.	If the generator specifies alternative treatment standards for lab packs, is the certification required in NR 675.07(1)(j) or (k) included with the notification for each shipment?	Yes	No	NA

C. **Off-Site Management: Waste Meets Treatment Standards**

1.	Does the generator ship waste that meets treatment standards/prohibition levels to an off-site disposal facility? *If no, go to D.*	Yes	No	
2.	Does the generator provide a notification and a certification to the disposal facility with each waste shipment? NR 675.07(1)(b)	Yes	No	NA
3.	Are characteristic wastes which have been rendered nonhazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?	Yes	No	NA

D. Records Retention:

1.	Does the generator retain on site copies of all LDR notifications, certification, and other relevant documents for a period of 5 years? NR 675.07(1)(e)	Yes	No	
2.	Do LDR documents reflect proper management of wastes previously covered under expired national capacity variances, case-by-case extensions and the soft hammer provisions? *Note: See summary table on page 2, (treatment standards column).*	Yes	No	NA

VII. **ANNUAL REPORTING** NR 615.11(1)

A.	Have Annual reports covering generator activities during the previous calendar years been submitted?	Yes	No

Comments: _____

VIII. **CONTINGENCY PLAN AND SAFETY REQUIREMENTS NR 615.05(4)(a)5 and NR 630.22**

A.	Does the generator have a <u>written</u> contingency plan addressing potential discharge of hazardous waste or hazardous waste constituents to air, land, groundwater, or surface water? NR 630.22(1)(a)	Yes	No

Note: If the answer is no, go to IX.

B. Is the contingency plan and all revisions kept by the generator and have they been filed with the Department and been sent to all local police and fire departments, hospitals and emergency response teams who may be called to provide emergency services? NR 630.22(1)(b) Yes No

C. Does the plan identify an Emergency Coordinator (including name, position, home address, home and business phone) who is present at all times when the generator is in operation, and present or on call when the generator is not in operation and available to respond to an emergency by reaching the site in a short period of time? NR 630.22(1)(d) and NR 630.22(1)(e)1 Yes No

D. Does the Emergency Coordinator have the authority and training necessary in the event of an emergency? NR 630.22(1)(d) Yes No

E. Does the plan contain the following:

1. A description of the site layout, types of waste handled their associated hazards, places where site personnel normally work, and entrances to and roads inside the site? NR 630.22(1)(e)2 Yes No

2. An evacuation plan for the site personnel, including signal(s) to be used to begin evacuation, evacuation roads, and alternative routes? NR 630.22(1)(e)3 Yes No

3. Procedures for emergency shutdown of operations, and the actions personnel must take to comply with NR 630.22(1)(a) in response to an emergency including, as appropriate, procedures to:

a) Activate internal alarms or communication systems to notify all personnel of an imminent or actual emergency situation, where applicable? NR 630.22(2)(a)1. Yes No NA

b) Telephone the Division of Emergency Government at 608/266-3232 and comply with the requirements of s. 144.76, Stats., and Chapter NR 158, Wis. Adm. Code? NR 630.22(2)(a)2 Yes No NA

c) Immediately identify the character, source, amount, and areal extent of any discharged materials? NR 630.22(2)(a)3 Yes No NA

d) Assess possible hazards to human health or the environment that may result from discharge, fire, or explosion? NR 630.22(2)(a)4 Yes No NA

e) Immediately notify appropriate local authorities, if an assessment indicates that a discharge, fire, or explosion could threaten human health or the environment outside the site, and that evacuation of local areas may be advisable? NR 630.22(2)(a)5. Yes No NA

f) Take all reasonable measures necessary to ensure that fires, explosions, and discharges do not occur, reoccur, or spread to other hazardous waste at the site? NR 630.22(2)(a)6 Yes No NA

g) Monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes or other equipment, where appropriate, if the generator stops operation in response to a fire, explosion, or discharge? NR 630.22(2)(a)7 Yes No NA

h) Provide for treating, storing or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a discharge, fire, or explosion at the facility, immediately after an emergency? NR 630.22(2)(a)8 — Yes No NA

i) Ensure that, in the affected areas of the site, no waste that may be incompatible with the discharged materials is treated, stored, or disposed of until cleanup procedures are completed; and all emergency equipment listed in the contingency plan is clean and fit for its intended use before operations are resumed? NR 630.22(2)(a)9 — Yes No

j) Procedures to be used to notify local police and fire departments, hospitals and emergency response teams of a discharge of hazardous waste or a fire or explosion at the site? NR 630.22(1)(e)5 — Yes No

k) Notify the Department and appropriate local operations are resumed? — Yes No authorities before NR 630.22(2)(b)

l) An up-to-date list of all emergency equipment at the site, including the location, physical description and a brief outline of its capabilities for each item? NR 630.22(1)(e)6 — Yes No

F. Does the contingency plan need to be amended due to changes? NR 630.22(1)(c)1-5 — NR Yes No

Note: The inspector shall ensure that the plan is site specific, that there are emergency coordinators assigned for all shifts, and that all personnel are trained in evacuation procedures.

Comments: _____

IX. **PERSONNEL TRAINING/RECORDS: NR 615.05(4)(a)5 & 630.16**

A. Does the generator have a program of classroom instruction or on-the-job training for personnel in hazardous waste management procedures? NR 630.16(1) — Yes No

If the answer is no, then a training program must be developed; go to X.

B. Does this program include training of personnel in Contingency Plan implementation? NR 630.16(1)(a) — Yes No

C. Do personnel take part in an annual review of initial training? NR 630.16(3) — Yes No

D. Are records of personnel training maintained by the generator? NR 630.16(4) — Yes No

If the answer is no, then these records must be developed and maintained by the generator; go to X.

E. Which of the following items are included in the personnel training records? NR 630.16(4)(a)-(d)

1. Job titles and the name of the employee filling each job? — Yes No
2. Job descriptions? — Yes No
3. Description of training required for each position? — Yes No
4. Written documentation that training or job experience has been given and completed? — Yes No

F. Are training records of current personnel kept until closure? Training records of former employees must be kept for at least 3 years from the date the employee last worked at the site. NR 630.16(5) — Yes No

Comments: _____

X. **PREPAREDNESS AND PREVENTION: NR 615.05(4)(a)5 and NR 630.21**

A. Does the generator have the following equipment, as applicable for the type of waste managed? NR 630.21(2)

1.	Internal communication systems?	Yes	No	
2.	A device to summon emergency assistance, such as a telephone or a 2-way radio?	Yes	No	NA
3.	Portable fire extinguishes?	Yes	No	
4.	Fire control equipment, including special extinguishing equipment and extinguishing agents?	Yes	No	NA
5.	Spill control equipment?	Yes	No	
6.	Decontamination equipment?	Yes	No	

B. Is all emergency equipment immediately accessible to persons handling the wastes? Yes No

C. Is all of the equipment mentioned in #1 tested and maintained as required to assure its proper operation in an emergency? Yes No

D. Is adequate aisle space provided throughout the hazardous waste site to allow unobstructed movement of personnel and all emergency equipment mentioned in #1 above? NR 630.21(5) Yes No

E. Has the generator made service arrangements with the following groups appropriate for the type of waste handled at the facility and their potential need for the services?

1.	Familiarized police, fire dept. and emergency response team with facility layout, properties of hazardous waste hazardous waste handled, and associated hazards. NR 630.21(6)(a)	Yes	No
2.	Where more than one police and fire dept. may respond to an emergency, designated primary emergency authority. NR 630.21(6)(b)	Yes	No
3.	Made agreements with state emergency response teams, emergency response contractors and equipment suppliers. NR 630.21(6)(c)	Yes	No
4.	Familiarized local hospital with properties of hazardous waste handled at the facility and the types of illness or injury that could result from exposure. NR 630.21(6)(d)	Yes	No

Comments: _____

XI. **OTHER REQUIREMENTS**

A. Does the generator have spill containment tanks? Yes No

If the answer is yes, then complete the appropriate attachment.

B. Does the generator combine absorbent material with waste generated on site? Yes No

If the answer is yes, complete the appropriate attachment.

XII. **90-DAY CONTAINER ACCUMULATION: NR 615.05(4)(a) & 615.09(2)(a)**

NOTE: Containers and tanks are the only means allowed to store large quantities of hazardous waste and be eligible for the 90-day exemption. Any other means of storage, such as waste piles, require an interim or operating storage license/variance. (See the definitions of container, tank and pile in NR 600.03). If waste is stored in tanks, complete attachment for tanks.

		Yes	No	
A.	Does this generator accumulate hazardous waste in containers?			

If no, skip this section.
If yes, continue below.

B.	Are the containers marked with the date on which hazardous waste was first placed in the container for accumulation? NR 615.05(4)(a)4	Yes	No	
C.	Are containers marked with the words "Hazardous Waste" before placing them in an accumulation area or on-site storage area? NR 615.09(2)(a)	Yes	No	
D.	Is the hazardous waste removed from the site before the end the 90-day accumulation period or treated, stored or disposed of in an approved on-site hazardous waste facility or on-site recycling facility? NR 615.05(4)(a)1.a. or b.	Yes	No	
E.	Are all the containers which are used to store or treat hazardous waste in good condition? 615.05(4)(a)2.d.	Yes	No	
F.	Are containers made of or lined with materials which are compatible with the wastes in them? NR 615.05(4)(a)2.j.	Yes	No	
G.	Are containers stored closed, except when it is necessary to add or remove waste? NR 615.05(4)(a)2.e.	Yes	No	
H.	Are containers opened, handled and stored in such as way as to prevent leaks or ruptures? 615.05(4)(a)2.f	Yes	No	
I.	Are containers inspected weekly for leaks and defects? NR 615.05(4)(a)2.b	Yes	No	
J.	Are the weekly inspections recorded into an inspection log or summary, which includes the date and the time of inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions? NR 615.05(4)(a)2.c.	Yes	No	
K.	Are records kept for at least 3 years from date of inspection? NR 615.05(4)(a)2.c.	Yes	No	
L.	If the generator stores ignitable or reactive waste, are the containers at least 50 feet (15 meters from the property line? NR 615.05(4)(a)2.g.	Yes	No	NA
M.	Are containers of incompatible waste separated or protected from each other by physical barriers such as a berm, dike, wall or other device? NR 615.05(4)(a)2.h.	Yes	No	NA
N.	Is hazardous waste placed in an unwashed container that previously held an incompatible waste or material? NR 615.05(4)(a)2.i. If yes, see NR 630.17(2)	Yes	No	NA
O.	Is the container made or lined with materials that are compatible with the hazardous waste to be stored? NR 615.05(4)(a)2.j.	Yes	No	NA

Comments: _____

_____

XIII. SATELLITE ACCUMULATION NR 615.05(4)(c)

A.	Does the generator accumulate waste at or near the generation point?	Yes	No

If no, skip this section.
If yes, continue below.

1.	Is the container in good condition? NR 615.05(4)(c)1.	Yes	No

2. Is the container always closed except when it is necessary to add or remove waste? NR 615.05(4)(c)2. Yes No

3. Is the container lined or compatible with the waste being accumulated? NR 615.05(4)(c)4. Yes No

4. Is the container marked with words "Hazardous Waste" or with other words that correctly identify the contents of the container? NR 615.05(4)(c)5. Yes No

5. Have 55 gallons or more of hazardous waste accumulated at or near the generation point? NR 615.05(4)(c)6. Yes No NA

6. Has one quart or more of acutely hazardous waste listed in section NR 605.09(2)(a), Table II, or (3)(b), Table IV, accumulated at or near the generation point? NR 615.05(4)(c)6. Yes No NA

If the answer to either e or f is yes, then the facility must comply with applicable generator requirements of NR 615.05(4)(a) for this waste (90-day accumulation).

XIV. WASTE MINIMIZATION

Section NR 615.08(8)(k) requires the generator to certify on the hazardous waste manifest that he/she has a program in place to reduce the volume and toxicity of waste generated to the degree economically practicable.

A. Does the generator have a waste minimization/pollution prevention plan or other written documentation of their program? Yes No

If yes, can the generator document that a program is being implemented? Yes No NA

If no, can the generator provide other evidence to justify their waste minimization certification? Yes No NA

B. Look for visual evidence that there is a waste minimization program in place. Make appropriate suggestions for their consideration and provide them with Department literature and information sources.

Comments _____
_____
_____

XV. STATUS EVALUATION

A. Classification Based on District Verification: _____

Note: If the inspection-verified classification is different from the current notification status, a status change form (Form 4430-12) should be completed and attached.

Signature: _____ Date: _____

This generator is also subject to regulation as a:

_____ Treatment Facility (specify container, tank, other) _____

_____ Exempt Treatment Facility (specify) _____
_____ Transfer Facility

_____ Storage Facility (specify, container, tank) _____

_____ Exempt Storage Facility (specify) _____

_____ Disposal Facility

_____ Transporter